

REMARKS

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1-23, 25-50, 52-78, 80-84 and 88-93 are now present in the application. Claims 91-93 have been added. Claims 1, 28, 55 and 88-90 are independent. Reconsideration of this application, as amended, is respectfully requested.

Allowable Subject Matter

The Examiner has indicated that claims 25, 52, 80 and 88-90 are allowed. Applicants appreciate the indication of allowable subject matter by the Examiner.

Claim Rejections Under 35 U.S.C. §112

Claims 1-23, 26, 27, 28-30, 53, 54, 55-78 and 81-84 stand(s) rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. This rejection is respectfully traversed.

As the Examiner will note, claims 1, 28 and 55 have been amended to address the Examiner's requested changes. In particular, the specification on paragraphs 65, 73 and 113 clearly specifies the term "current role of the user" and how the meta data is retrieved from the meta data collection based on at least the current role of the user. Accordingly, all pending claims comply with the written description requirement. Reconsideration and withdrawal of the rejection under 35 U.S.C. § 112, first paragraph, are therefore respectfully requested.

Claim Rejections Under 35 U.S.C. § 103

Claims 1-4, 10-11, 17, 20-22, 28-31, 37-38, 44, 47-49, 55-57, 59, 77 83, and 85-87 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick, (U.S. Patent No. 5,710,884; hereinafter as “Dedrick”) in view of Arlein et al. (U.S. Patent Application Publication No. US 2002/0133500; hereinafter as “Arlein”). Claims 5-6, 32-33 and 60-61 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Nguyen (U.S. Patent No. 5,638,448). Claims 7-9 and 34-36 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Kim (U.S. Patent No. 6,546,002 B1). Claims 12-16 and 39-43 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Bull et al. (U.S. Patent No. 5,901,287). Claims 18 and 45 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Mohan et al. (U.S. Patent No. 6,505,230 B1). Claims 19 and 46 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Chun et al. (U.S. Patent No. 2002/0184527 A1). Claims 23, 50 and 78 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Nagahara et al. (U.S. Patent No. 6,636,246 B1). Claims 26, 53, 58, 65-66, 72, 75-76 and 81 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of the article entitled ‘Net Security Standard from the Open Group Brings the Realization of High-Value E-Commerce for Everyone a Step Further’ (hereinafter as “Net Security Standard article”). Claims 27, 54 and 82 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein, and further in view of Charisius et al. (U.S. Patent Publication No. 2002/0077842 A1). Claims 62-64 are rejected under

35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein and the Net Security Standard article, and further in view of Kim. Claims 67-71 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein and the Net Security Standard article, and in further view of Bull et al. Claim 73 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein and the Net Security Standard article, and further in view of Mohan et al. Claim 74 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein and the Net Security Standard article, and in further view of Chun et al. Claim 84 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Dedrick in view of Arlein and the Net Security Standard article, and further in view of Lim et al. (U.S. Patent 6,728,843 B1). These rejections, insofar as they pertain to the presently pending claims, are respectfully traversed.

Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

Independent claim 1 now recites a combination of steps including "updating a local repository of the computing device with at least one segment from the central repository that is associated with the user to produce a meta data collection associated with the user", "utilizing, by the computing device, the meta data collection during a current user session at the computing device to assist the user in using the computing device" and "the utilizing step comprises retrieving, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user".

Independent claim 28 now recites a combination of elements including "computer executable code configured to update a local repository of the computing device with at least one

segment from the central repository that is associated with the user to produce a meta data collection associated with the user”, “computer executable code configured to utilize, by the computing device, the meta data collection during a current user session at the computing device to assist the user in using the computing device” and “the computer executable code configured to utilize comprises computer executable code configured to retrieve, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user”.

Independent claim 55 now recites a combination of elements including “at least one computing device capable of communicating with the central repository subsystem through a communications network, the computing device comprising a local repository and being capable of connecting, through the communications network, to the central repository based on a user input, updating the local repository with at least one of the segments from the central repository to produce a meta data collection associated with the user, and utilizing the meta data collection during a current user session at the computing device to assist the user in using the computing device” and “the computing device retrieves, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user”.

Support for the above combinations of elements and steps can be found at least on paragraphs 57, 59, 65, 73 92 and 113 of the specification as originally filed. Applicants respectfully submit that the above combinations of elements and steps set forth in claims 1, 28 and 55 are not disclosed or suggested by the references relied on by the Examiner.

The Examiner has correctly acknowledged that Dedrick fails to teach retrieving, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user as recited in claims 1, 28 and 55. However, the Examiner on page 5, first paragraph of the instant Office Action made a conclusory statement that Arlein teaches the above feature by simply reciting two paragraphs of Arlein and stating that the motivation exists because Arlein's teaching would customize the content of the user based on the user's activities while preserving privacy of the users. Applicants respectively disagree.

The Examiner did not clarify how to modify Derick in view of Arlein's teachings on paragraphs 0009 and 0032. These showings by the Examiner are an essential part of complying with the burden of presenting a *prima facie* case of obviousness. These showings must be clear and particular, and broad conclusory statements about the teaching of multiple references, standing alone, are not "evidence." See In re Dembiczak, 175 F.3d 994 at 1000, 50 USPQ2d 1614 at 1617 (Fed. Cir. 1999). Note, In re Oetiker, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Moreover, a factual inquiry whether to modify a reference must be based on objective evidence of record, not merely conclusory statements of the Examiner. See, In re Lee, 277 F.3d 1338, 1343, 61 USPQ2d 1430, 1433 (Fed. Cir. 2002). Therefore, if the Examiner persists in maintaining his rejection, Applicants respectfully request that the Examiner clarify how Derick can be modified and for what motivation in view of Arlein in the next Office Action.

In addition, Derick and Arlein are non-combinable. Arlein discloses that it allows the merchant server to read a persona profile of a user from the persona database 208 remote from the user and the merchant (see FIGs. 2 and 4; paragraphs 0075-0079). In other words, the

persona profile is obtained by *the merchant server* at the merchant's site. However, the computer device *of the user* does not obtain the persona profile itself because it is the merchant server, not the computer device of the user, that uses the persona profile of the user.

On the other hand, Derick teaches that the user profile is downloaded from the network to *the computer of the user* (see FIG. 9). Since Derick and Arlein are different regarding the devices (Derick – the user's computer; Arlein – the merchant server) to store the user/persona profile, Derick and Arlein are non-combinable.

Furthermore, none of the other references applied by the Examiner correct these deficiencies of Dedrick, and thus, make the claimed invention obvious over Dedrick. Thus, even if the references were combinable, assuming *arguendo*, the combinations of references as applied by the Examiner would still fail to teach or suggest the invention as recited in claims 1, 28 and 55 since the other secondary reference(s) do not teach or suggest the claimed features that are missing from Dedrick.

Accordingly, the invention as recited in claims 1, 28 and 55 and their dependent claims (due to their dependency) is patentable over the applied references, and the rejections should be withdrawn.

Additional Claims

Additional claims 91-93 have been added for the Examiner's consideration.

Claims 91-93 recite "the meta data collection stored in the local repository of the computing device at the user's side includes a plurality of meta data groups, each of the meta data groups corresponding to one of a plurality of roles of the user". Support for claims 91-93

can be found on at least paragraphs 0058, 0065, 0073, 0074 and FIGs. 3A-B as originally filed. Claims 91-93 are allowable due to their respective dependence on independent claims 1, 28 and 55, as well as due to the additional recitations included in these claims.

In the alternative, the utilized references also fail to teach the recitation of claims 91-93. As mentioned, Dedrick fails to teach retrieving, from the meta data collection, meta data that would be most appropriate for each of different contexts of using the computing device, based on at least a current role of the user. Therefore, Derick also fails to teach “the meta data collection stored in the local repository of the computing device at the user’s site includes a plurality of meta data groups, each of the meta data groups corresponding to one of a plurality of roles of the user” as recited in claims 91-93.

Although Arlein discloses that a user may have a plurality of personas saved in the persona database, the merchant server is allowed to read the profile of *only one persona per user* in order to protect the user’s privacy (see paragraph 0034). Therefore, the merchant server can only obtain the profile of *one persona per user*, not the profiles of a plurality of personas of the same user. Therefore, Arlein fails to teach “the meta data collection stored in the local repository of the computing device at the user’s site includes *a plurality of meta data groups, each of the meta data groups corresponding to one of a plurality of roles of the user*” as recited in claims 91-93.

In the alternative, the profile of one persona of the user is stored in the merchant server remote to the user, not in “the local repository of the computing device at the user’s site” as recited in claims 91-93.

By storing a plurality of meta data groups respectively corresponding to a plurality of roles of the user, the computer at the user's side can retrieve the most appropriate meta data for each of different contexts of using the computer device based on at least the current role of the user. For instance, in an example described on paragraphs 0092-0094 of the specification, the user may prefer to view a particular page in a larger font size than other pages, or to view all pages in the same predetermined settings when the user functions in a particular role, e.g., as an employee of the owner of the computer. In this context, when a particular web page needs to be displayed to the user, it is determined if the user's meta data collection includes any page display setting data that would be most appropriate for the current context of displaying the particular web page. Then the most appropriate page display setting data are retrieved from the local repository and the retrieved page display setting data are applied during the displaying process to display the current web page according to the retrieved data. This feature is clearly absent from the utilized references.

Favorable consideration and allowance of additional claims 91-93 are respectfully requested.

CONCLUSION

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 09/0461 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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